

COLE SCHOTZ P.C.

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Attorneys for Defendant, NaviStone, Inc.

MICHAEL ALLEN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

QUICKEN LOANS INC. and NAVISTONE,
INC.,

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CIVIL ACTION NO. 17-cv-12352 (ES)(MAH)

**DECLARATION OF JAMIE P. CLARE,
ESQ. IN SUPPORT OF APPLICATION TO
ADMIT RICHARD G. MENAKER, ESQ.,
ALEXANDER MIRKIN, ESQ. AND DAVID
W. BERTONI, ESQ. *PRO HAC VICE***

JAMIE P. CLARE, of full age, certifies pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at law admitted to practice before this Honorable Court and a Member of Cole Schotz P.C., attorneys for defendant NaviStone, Inc. (“NaviStone”). I am fully familiar with the facts set forth herein and make this Declaration in support of NaviStone’s application to admit Richard G. Menaker, Esq., Alexander Mirkin, Esq. and David W. Bertoni, Esq. *pro hac vice* pursuant to Local Civil Rule 101.1.

2. Messrs. Menaker and Mirkin are attorneys with the law firm of Menaker & Herrmann LLP, located at 10 East 40th Street, New York, New York 10016.

3. Mr. Bertoni is a member of the firm of Brann & Isaacson, located at 184 Main Street, 4th Floor, Lewiston, Maine 04243-3070.

4. NaviStone has requested that Messrs. Menaker, Mirkin and Bertoni be admitted *pro hac vice* for this matter because of their particular experience in the relevant areas of law and detailed knowledge of the facts and issues in this case. As the Court can see from their

declarations, they are all members in good standing of their respective Bars, none have been convicted of a felony, censured, suspended, disbarred or denied admission or readmission by any court, and there are no pending disciplinary proceedings against them in any state or federal court.

5. I have informed Messrs. Menaker, Mirkin and Bertoni of the requirements of this Court upon attorneys admitted *pro hac vice* under Local Civil Rule 101.1(c). I am also aware of the requirements imposed upon me by this Court as the attorney making the instant application.

6. I certify that I will comply with L. Civ. R. 101.1(c) in acting as local counsel for Messrs. Menaker, Mirkin and Bertoni upon their admission.

7. In that regard, I will sign all documents filed with the Court, appear at all hearings, and accept service of all notices, orders, and pleadings in this action as required by Local Civil Rule 101.1(c)(4).

8. Counsel for plaintiff, Michael Allen, has consented to Messrs. Menaker, Mirkin and Bertoni's *pro hac vice* admission.

9. Accordingly, it is respectfully requested that this Court enter an order admitting attorneys Richard G. Menaker, Esq., Alexander Mirkin, Esq. and David W. Bertoni, Esq. *pro hac vice* to practice before this Honorable Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

COLE SCHOTZ P.C.
Attorneys for Defendant, NaviStone, Inc.

By: /s/ Jamie P. Clare
Jamie P. Clare

February 1, 2018